

## The Dominguez-Escalante National Conservation Area Advisory Council's Preferred Alternative

June, 2012

These are the recommendations the Dominguez-Escalante NCA Advisory Council is submitting to the BLM for consideration in the development of the Preferred Alternative for the Dominguez-Escalante National Conservation Area (D-ENCA) Resource Management Plan. These recommendations are the result of many hours of discussion, deliberation, collaboration and gathering public input by the members of the D-ENCA Advisory Council. This document is testimony to the many long hours spent by the Council members formulating a plan of action for D-ENCA.

The Members of the D-ENCA Advisory Council represent a diverse range of interests and backgrounds, but all members made a concerted effort to reach a consensus. About 50% of the recommendations reached a consensus. Most of the rest of the recommendations were one or two votes shy of consensus. Only one topic, target shooting, was widely split, so no recommendation was presented.

The Council would like to thank the BLM for its hard work and patience in our endeavor, and, in particular, thank designated federal officer Katie Stevens and BLM staffers Ben Blom, Andy Windsor and Brodie Farquhar for their assistance. Also, thanks to all the members of the public who made important comments during the Council's meetings.

### **Biological and Natural Resources:**

The BLM should consider the constraints put on management with an alternative focused primarily on natural processes, and should consider structuring objectives as moving in desired trends versus required thresholds to be obtained. To depend on natural processes, especially during times of drought, would put limitations on tools to restore natural processes. The BLM should preserve tools to maintain and restore ecosystem conditions.

The BLM should consider three specific vegetation types or habitats as priorities for management attention:

- 1) Riparian (including seeps and springs) because of the high dependence of wildlife species and other resources on these systems.
- 2) Sagebrush Community
- 3) Areas with sensitive species (e.g. Colorado hookless cactus)

The BLM should recognize that good conditions already exist for some species, and that part of the reason why the NCA was created was because of its outstanding biological resources. It would be hard to find a more diverse piece of property, one of the reasons D-ENCA was created. The BLM should also recognize that there are "pockets" of importance within overall habitat types, and management approaches may not be necessary or appropriate across the NCA. The BLM should recognize that where

good conditions exist they should be maintained. The Advisory Council values what is there now, but maintaining it the way it is will be more challenging as more people visit the NCA.

The BLM should consider phrasing desired outcomes using criteria (e.g., avoid grazing during growing season versus hard-and-fast dates (e.g., April 1). Dates can fluctuate year-to-year depending on weather conditions.

The BLM should recognize that the biological resource management under Alternate B is very restrictive and will keep people from enjoying the land. There was some support for Alternate C re: natural resources management in some areas.

The BLM should retain tools to manage a healthy prairie dog population.

When considering Gunnison Sage-grouse, the BLM should consider providing a mix of habitat types for sage grouse, again retaining the habitat management tools to create a diversity of habitat types. The Advisory Council supports the very restrictive management re: new routes in unfragmented sagebrush parks as in Alternative C. This is one area where conservation should be prioritized above recreation.

When implementing restrictions, the BLM should define where the area in question is. For example, where restrictions are considered for Rose Creek, a specific area should be defined, and not close the whole area. If it is necessary to close a riparian area, consider providing replacement water resources through range developments outside the riparian area. When identifying areas for trailing only, the BLM should acknowledge the need for cattle to have access to water.

The Advisory Council supports limiting camping in riparian areas.

### **Desert Bighorn Sheep:**

The Advisory Council supports the presence of Desert Bighorn Sheep in the NCA, and supports the division of the probability of interaction into high, medium and low classifications. When considering potential management restrictions to protect the desert bighorns the BLM should carefully consider and recognize the economic effects on the wider area, including the Hotchkiss area, as well that stress from increasing recreation will be a significant factor. The BLM should consider swapping grazing allotments (e.g., sheep for cattle) where opportunities exist in high-risk allotments. BLM should recognize that stress from increasing recreation will be a significant factor (not just potential disease transmission).

Individual members of the Advisory Council support WAFWA guidelines as state-of-management recommendations, but the BLM should also carefully consider and recognize the limitations that these recommendations would put on permittees. The BLM should consider the application of these national guidelines on local conditions based on effectiveness. The BLM should consider management strategies for people with dogs in areas where potential desert bighorn interaction is high. Also, if inoculation becomes a viable option the use of protein tubs should be considered as a potential method.

**Wilderness:**

The BLM should consider the need for access points to the wilderness, where appropriate by zone that gets people to the wilderness boundary in multiple places. The BLM should consider maintaining current day-use only management in lower Big Dominguez/Little Dominguez canyons. The use of bolts for rock climbing should not be allowed in the wilderness. The value of wilderness for education should be considered, and consider group size that permits educational purposes. The Advisory Council supports the concept of managing wilderness by zone – trends in Lower Big and Little Dominguez canyons are distinct from other areas of the wilderness.

The BLM should consider prohibiting geocaching other than by virtual means, and allow for vegetation and wildlife monitoring devices re: Bighorn Sheep to minimize visual impacts. The BLM should manage the ranching history of the wilderness by preserving the Rambo Homestead and old fences. Clean up may be needed, but don't remove man-made features just because they aren't natural, as appropriate with management objectives. In the event where permits would be required in the wilderness, the Council would like to see impact triggers used to determine the need for a permit system.

**Cultural Resources:**

The Advisory Council agrees that off-site interpretation is generally better with features such as historic wagon tracks, roads and the Old Spanish Trail to protect what little is left. The Advisory Council also agrees that education about our heritage is important whether the site is a Native American site or a historic feature. The BLM should not draw attention to all cultural sites, and should carefully consider which sites will have on-site interpretation. Interpretation and education can be a powerful tool, but the Advisory Council recognizes that self-discovery is an important theme, and suggests limiting developed interpretive sites.

Delta County is not opposed to heritage tourism, but the impact of additional travel should be considered. Delta County remains concerned about the impacts on private landowners. In Escalante Canyon specifically, the road is not likely to be upgraded. The effects of increased visitation on safety could be considerable, and needs to be considered in the BLM's management objectives.

**ACEC's**

The Gunnison Gravels ACEC should be retained.

The BLM should consider managing Cottonwood Canyon as an ACEC in lieu of a Wild and Scenic River status, but the BLM should provide more information on the relevant and important values, and what kind of special management would be appropriate.

**Lands with Wilderness Characteristics:**

The BLM should recognize that the Dominguez Addition is not unroaded and motorized access is important to allow access to the wilderness. Roads systems are substantially absent in the Cottonwood

Canyon, Escalante Dry Fork and Gunnison Slopes areas, so the BLM should consider maintaining them that way.

### **Scenic Values:**

The Council values the unroaded, undisturbed nature of the Gunnison Slopes area. Where areas are notable for their current lack of roads it is important to maintain them in that condition.

(All but 1 Council member agreed with the above statement)

The northern end of the Hunting Grounds has some old wagon tracks/ruts that should be managed to preserve these visible traces.

The Council values the scenic importance of the entire NCA, but the BLM should also consider the importance of providing access so people can appreciate the scenic values. More than a super majority of Council Members supported the above statement with the opposing opinion stating that scenic values should trump access if a proposed route would diminish a particular view.

### **Resource Uses:**

**Recreation:** For Zone 1, Hunting Grounds, Zone 2, Gunnison River, Zone 3, Cactus Park, Zone 4 Wilderness, Zone 5, Escalante Canyon/Sawmill Mesa/Cottonwood Canyon

#### **® Hunting Grounds:**

The Hunting Grounds is an area used by motorized and non-motorized recreationists and, the users are probably local versus national or international, and an approach for heritage tourism that excludes motorized use is too restrictive.

The BLM should consider off-site interpretation for the Old Spanish Trail and other feature and traces associated with it (Salt Lake Wagon Trail and Col. Loring's route)

A super majority of Council members support a multiple-use connector trail between Grand Junction and Delta. (vote 7-2, 1 no opinion). One segment of this proposed trail goes through the Escalante Wildlife Area which has a use restriction during the spring and early summer, and may have an effect on this trail's feasibility.

The BLM should recognize that this zone is not as widely used as Cactus Park. EMRA-style management may be appropriate here to protect grazing, traditional uses and cultural resources. Grazing has been in this area for 130 years, so the social, economic and cultural value of ranching should be recognized. Recreationists seem to enjoy the dispersed nature of recreation in this zone and the area's undeveloped character.

The Bean Ranch Road is the only legal access into the Hunting Grounds, so the BLM may want to look into developing an additional access. (Vote 7-3 in favor, one opposing opinion suggested that this option would be very expensive).

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### **Gunnison River:**

The Council views camping associated with river rafting as the main recreational activity in this zone; consequently, the walk-in camping traffic may create a conflict with overnight boating. The BLM should consider the importance of river campsites for river recreation. The BLM should consider eliminating the two camp sites at the mouth of Dominguez Canyon. This area is overused (impacts on vegetation); some people find it awkward to walk through someone's camp to get to the mouth of the canyon. This could create a more welcoming entry into the wilderness. After study, the Council recommends that this zone be managed as a SMRA. Consider the importance of objectives, such as those developed for the Ruby-Horsethief section of the Colorado River, in providing clarity on the type of visitors being managed for, and the quality/nature of experience being provided. Also, consider the importance of protecting shorelines from overuse.

(The above recommendations received a 9-1 vote in favor.)

The BLM needs to consider the importance of the zone for wildlife such as nesting birds and water fowl, bighorn sheep and cottonwood galleries. Also, consider the importance for livestock to water along the river. The BLM should prioritize knapweed and other noxious weed treatment along the river corridor. The BLM should look for opportunities to develop additional campsites above and below Dominguez Canyon and Bridgeport.

(Full consensus on the above recommendations)

### **®Cactus Park/Nine Mile Hill**

The Council recommends that the BLM consider SRMA-style management focused on motorized recreation in this zone. (An 8-2 vote in favor)

Nine Mile Hill may provide opportunities for more mixed-use including non-motorized recreation. (9-1 in favor), but non-motorized trail opportunities along the rim with key overlooks off of main road. Received full consensus.

The Gibbler Mountain area is important to wildlife, and may provide opportunities for non-motorized recreation as well. Please note previous comments from motorized recreationists have focused on routes in Cactus Park circumventing the Gibbler mountain area. (9-1 in favor).

### **®Gunnison Slopes**

The BLM should consider managing the Gunnison Slopes area to maintain its current untrailed condition and its unique wild nature.

#### ® East Creek

The BLM should consider the visual effects related to rock climbing hardware and the placement of bolts in soft sandstone. Generally, the Council notes that bolt lines are not desired; however, bolt lines designed to protect sensitive resources may be acceptable, as long as they are placed to reduce their visibility. (9-1 in favor)

#### ® Escalante Canyon

The BLM should acknowledge that this area is important for recreation in the spring summer and fall. But also consider the demands that marketing the canyon as a destination-tourism stop would have on the current infrastructure in the area.

The BLM should pursue discussions with Colorado Parks and Wildlife related to stabilizing Cap Smith's Cabin and the Walker building. Repairing the roofs on both structures would go a long way towards protecting these buildings. Seeking input from the local historic society or interpretive group may stimulate some interest in stabilizing these structures. (9-1 in favor).

#### ® Sawmill Mesa Area (The area around and north of Negro Gulch, Cactus Park and Club Gulch)

The BLM should consider the recreation value of the Escalante Rim Road (Old Delta Road), as well as the use of this area by bighorn sheep in the winter. There is a large area to the north of Club Gulch over to the Escalante and Gunnison rims that have good potential for mixed (motorized and non-motorized) recreation. (1 dissenting vote). *The Council member brought up a very legitimate point about the use of this area by domestic and bighorn sheep and how that mix with recreationists could impact bighorn sheep. Possibly a winter-time access ban or separate the sheep from most recreational activities?*

#### ® Cottonwood Creek

The Council views the Cottonwood Creek area as a good opportunity for hiking and equestrian use due to the lack of existing infrastructure – no roads or trails.

#### ® Recreation issues not confined to zone:

The Council reached consensus that paintball use is an incompatible/ inappropriate use in the NCA. The BLM should consider a ban on glass containers in the NCA, and should consider limiting geocaching in the wilderness to virtual or earth caches. (9-1 in favor), and some concern that traditional geocaching would lead to social trails. (8-2 in favor)

On the subject of target shooting the Council was split 50/50 regarding allowing target shooting. For those opposed, the concern was a safety issue with the anticipated trail development and increased use. For those in favor it had to do with traditional use that

is done in a safe manner. The establishment of a designated shooting range or ranges might provide a safe environment for target shooting, but possibly create more problems with trash i.e. spent cartridges, hulls and targets. A commitment from a local club to do regular clean up days might be the answer. Due to the 50/50 split in the vote on this topic, the Council would like to revisit target shooting for further discussion either late in the process or upon the release of the draft from the BLM.

#### **Livestock Grazing:**

Support for the NCA via the Delta County Commissioners was dependent on the allowing of livestock grazing practices as traditionally provided for under law. Sound range management science shall be used for grazing management practices, plans and implementation. Range improvement projects, including, but not limited to vegetation modification, fencing, noxious weed control, and water development may occur when conducted under the supervision of the appropriate public conservation agency. The use of motorized vehicles for livestock grazing and range management purposes can occur as provided for in the appropriate management plan. In identifying areas for trailing only, the BLM should acknowledge the need for cattle to water.

In the Dry Fork of the Escalante, the BLM should consider allowing the cattle to drift instead of implementing trailing requirements. The steep nature of this drainage could create more ground disturbance if cattle are forced to trail instead of allowing them to drift on their own. The Council recognizes that the legislation allows placement of new livestock watering facilities in the wilderness. The environmental community supported these facilities during the development of the NCA's legislation, and continues to support the minimum number of water facilities needed to provide for grazing operations while protecting wilderness values.

The Council is concerned about the degree of restrictions that could be placed on sheep ranchers related to whether individual operators could be put out of business. The Council would prefer conservation approaches that maintain the viability of current operations where they exist while protecting the bighorn sheep. (8-2 in favor). At the same time, the Council notes that disease is a serious conservation issue for the bighorn sheep in particular, and some Council members feel the health of that population should be prioritized. (7-3 in favor)

*Those opposed to the above 2 statements support the idea that the ranchers were here prior to the reintroduction of the bighorn sheep, and that they be separated from domestic sheep grazing and recreationists.*

#### **Right of Ways and Utilities:**

Council members have two separate perspectives on rights-of-way. One perspective is that the BLM should take a permissive approach to leave room for future rights-of-way. The other perspective is that there be a very high bar for new utility developments. This approach would generally exclude new developments unless a plan was developed by amending the RMP. (Council vote was 8-2 in favor of a very high bar approach).

**Areas of Critical Environmental Concern:**

Currently the 5-acre Gunnison Gravels and the 1,895 acre Escalante ACEC's are within the Dominguez-Escalante NCA. Generally the Council feels that if the preferred alternative were to remove protections for areas that are considered for ACEC status, that the ACEC designation should be considered.

Cottonwood Canyon is an important, unique place and should be protected. Protecting Cottonwood Canyon from the pressures of development is important, so an ACEC designation may be an appropriate tool to protect its naturalness.